

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Bay State Gas Company

D.T.E. 05-27

ATTORNEY GENERAL'S SIXTH SET OF
DOCUMENT AND INFORMATION REQUESTS

- AG 6-1 Please provide a copy of the Company's current procedure manual for operations, maintenance and emergencies maintained in accordance with Title 49, Subpart L, § 192.605 of the Code of Federal Regulations, and all amendments, revisions and modifications to the manual since 1990.
- AG 6-2 Has the Company installed any steel mains of any type without cathodic protection after July 31, 1971? If "yes", state the number of feet of such main currently in service, and state all facts that demonstrate that the Company has complied with Title 49, Subpart I, § 192.455 of the Code of Federal Regulation. Produce all orders, decisions, letters, directives and approvals from all federal and state regulatory agencies, including the Department of Telecommunications and Energy, allowing the Company to install steel mains without cathodic protection after July 31, 1971.
- AG 6-3 Does the Company have any bare steel mains installed before August 1, 1971 without cathodic protection? If "yes", state the number of feet of such main currently in service, and state all facts that demonstrate that the Company has complied with Title 49, Subpart I, § 192.457 of the Code of Federal Regulation. Produce all orders, decisions, letters, directives and approvals from all federal and state regulatory agencies, including the Department of Telecommunications and Energy, excusing the Company from retrofitting cathodic protection on the bare steel mains installed before August 1, 1971.
- AG 6-4 Does the Company have any coated steel mains without cathodic protection installed before August 1, 1971? If "yes", state the number of feet of such main currently in service and state all facts that demonstrate

that the Company has complied with Title 49, Subpart I, §192.457 of the Code of Federal Regulation. Produce all orders, decisions, letters, directives and approvals from all federal and state regulatory agencies, including the Department of Telecommunications and Energy, excusing the Company from retrofitting cathodic protection on the coated steel mains installed before August 1, 1971.

- AG 6-5 Please explain in detail the Company's gas leak classification system. Provide a copy of the Company's written leak classification system, and include a copy of the Gas Piping Technology Committee ANSI Z389.1 Guide For Gas Transmission and Distribution Piping Systems, noted by the Company in Exh. BSG/DGC-1, p. 10 of 63, lines 7-9.
- AG 6-6 Does the Company's leak classification system allow for the reclassification of a leak from one Type to another Type after the initial report? If "yes" explain in detail the criteria for leak reclassification. For each leak reclassified after initial reporting since 2000, provide a copy of the original initial leak report and the leak report after reclassification. Produce any orders, decisions, letters, directives and approvals used by the Company to develop its leak classification system, including orders, decisions, letters, directives and approvals permitting the Company to reclassify leaks.
- AG 6-7 Explain in detail why "Type-3 leaks are typically not reported to the DOT in the annual DOT 7100 system reports" as noted in BSG/DGC-1, p. 10, lines 4-5. Include in this response an explanation of when Type-3 are reported, and copies of any authorities relied upon in making that statement.
- AG 6-8 Provide copies of all DOT 7100 system reports submitted to the DOT since 1995.
- AG 6-9 Refer to Exh. BSG/DGC-3, and expand that schedule to include data in all columns and rows starting in 1995 and ending in 2004 by type of main. Recalculate all averages as 10-year averages.
- AG 6-10 Refer to Exh. BSG/DGC-3, explain how the company determines the type of leak in the "Leak Category" column. Explain how the Company distinguishes "Corrosion" leaks (line 1) from the "Other" leaks (line 6)
- AG 6-11 Produce copies of all exposed pipe inspection records from 1995 to 2004.

- AG 6-12 Produce copies of any complaints, inquiries or notices of violation or potential violation of G. L. c. 164, § 105A, or its related state or federal regulations received by the Company since 1995. Identify any related fines assessed against the Company.
- AG 6-13 By year from 1995 to 2005, please identify the personal working in the Company's sales department.
- AG 6-14 By year from 1995 to 2005, please list the number of new residential and business customers signed-up by the sales department.
- AG 6-15 By year from 1995 to 2005, please identify the Company's suppliers of mains and services by name, address, telephone number and sales representative.
- AG 6-16 By year from 1995 to 2005, state the number of services and feet of mains purchased from each of the suppliers listed in the response to AG 6-15.
- AG 6-17 By year from 1995 and 2005, state the number of services and feet of mains that were acquired on credit.
- AG 6-18 By year from 1995 and 2005, state the number of services and feet of main that were acquired for cash.
- AG 6-19 Produce copies of all correspondence and other documents from the Company's suppliers listed in the response to AG 6-15 that declined to allow the Company to acquire mains or services on credit.

May 18, 2005